

Ms Mary Jane Coombs Director, Air Resources 7/26/18

Ms Coombs,

I am writing to inform you that Meiden America supports California's regulation to phase out the purchases of SF6 equipment, from the HV power grid, over the next decade. Meiden has non-SF6 switch gear technology to support this effort and has plans to develop additional Gas Insulated Switchgear (GIS) and Dead Tank Circuit Breaker (DTCB) at higher voltages and interrupting ratings to support your proposed phase out schedule.

Meiden is a 120 year old manufacturer of electrical infrastructure equipment (up to 204kV DTCB* and 145kV GIS*). Our "green" efforts include manufacturing voltage/current switching components and systems which do not employ SF6. Our products use Dry-Air/Vacuum technology which have a Global Warming Potential (GWP) of ZERO. Our products are used globally for electrical HV infrastructure.

The commercial challenge of replacing SF6 with a zero GWP alternative is significant. Employment of SF6 devices have been highly developed and proven. Our customers are comfortable using it. However, the environmental risks of SF6 (GWP 22,800) is also high and the capture and remediation of SF6 and byproducts are problematic. Therefore regulation and education may be required to encourage this change. Meiden supports environmentally sound technological advancements and eco-friendly initiatives.

Meiden informs California Air Resource Board that we intend to provide high voltage breakers and switchgears that will allow removing SF6 from the power utility supply and grid infrastructure in California and other states in the next 10 years. We would like to be considered as a partner to support CARB and the California power utilities in this effort. At this time Meiden has been developing 145kV DT VCB with dry-air insulation (SF6 free VCB), which will be released in 2020. We are working on higher voltage devices to make possible 245kv and above replacement of SF6 based grid components.

Thanks for your consideration,

Kirk Goodell

Executive Vice President Meiden America Inc 15800 Centennial Dr Northville MI 48168

Note \ast : Applicable standards IEC, JEC